

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

STEVEN R. DAVIS, an individual,  
Plaintiffs,

VS.

UNITEL VOICE, LLC d/b/a Telecom Management Group, Inc.; L3 COMMUNICATIONS, LLC; SOMOS, INC. & DOES I-X; and ROE CORPORATIONS I-X, inclusive

### Defendants.

Case No.: 2:18-CV-00673-JCM-PAL

**STIPULATION FOR EXTENSION  
OF TIME TO RESPOND TO  
DEFENDANT SOMOS INC'S  
MOTION TO DISMISS UNDER  
FED. R. CIV. P. 12(b)(5) FILED  
AUGUST 6, 2018.**

## **(First Request)**

Plaintiff Steven R. Davis, pro se, and Somos, Inc., through its undersigned counsel of record, agree that upon the Court's approval, Plaintiff's response to Defendant Somos Inc.'s Motion to Dismiss, currently due on August 20, 2018, shall be due two weeks from that date, on September 4, 2018, for the reasons set forth below:

1. Defendant Somos, Inc.’s Motion to Dismiss was filed on 8/6/18.
  2. Plaintiff, via email exchange, requested an Extension to September 4, 2018, to file his response.
  3. Plaintiff is pro se and has limited access to legal resources and needs the additional time to craft his response.
  4. Attorney Irwin Schwartz communicated his assent and advised that Plaintiff contact local counsel, Attorney Joseph Ganley, to “work out details”.<sup>1</sup>

<sup>1</sup> Pro Hoc Vice counsel

- 1           5. Accordingly, Plaintiff and Defendant, Somos Inc. agree that, upon the Court's
- 2           approval, Defendant's response to Plaintiff's Motion to Dismiss shall be due on
- 3           or before September 4, 2018.
- 4           6. Furthermore, upon receipt of Plaintiff's response, the Defendant Somos Inc.
- 5           shall have seven days to reply.
- 6           7. This Stipulation has been entered before the Motion is otherwise due.
- 7           8. Pursuant to Local Rule 6-1, this is Plaintiff and Defendant's first request for an
- 8           extension of this deadline.
- 9           9. The parties seek this extension in good faith and not for purposes of delay.

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10. No party would be prejudiced by the granting of this stipulated motion for an extension of time.

Dated, this the 18<sup>th</sup> day of August 2018, by the undersigned Plaintiff and counsel  
for Defendant, Somos Inc.

*/s/ Steve R. Davis*

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## HUTCHISON & STEFFEN, PLLC

*/s/ Joseph R. Ganley*

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and

Irwin Schwartz  
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*Attorneys for defendant Somos, Inc.*

## ORDER

IT IS SO ORDERED.

Dated: August 21, 2018.

Jewell C. Mahan  
U.S. District Judge